

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF ILLINOIS (EASTERN DIVISION)

TS Merchandising Ltd., a British Virgin Islands corporation, and TS Production LLC, a Hungarian limited liability company,

Case No. 07 C 6518

Plaintiffs,

AFFIDAVIT OF CHRISTOPHER E. PARKER

vs.

Dan and Loretta Hollings, Arizona residents, and Web Services, LLC, an Arizona limited liability company,

(Assigned to the Hon. Ronald A. Guzman)

Defendants.

AFFIDAVIT OF CHRISTOPHER E. PARKER

Personally appeared before me, the undersigned officer duly authorized to administer oaths in the State of Georgia, Christopher E. Parker, who, after first being sworn, deposes and says:

1.

I am over the age of twenty-one (21) years, of sound mind, and legally competent to give this testimony

2.

I have personal knowledge of the facts set forth in this affidavit.

3.

I am an attorney licensed to practice law, a member of the State Bar of Georgia and admitted to practice before this Court *pro hac vice*.

4.

I am counsel of record for the Defendants in this case.

5.

I did not divulge confidential information concerning the parties' pre-litigation mediation or information related to any mediation settlement offer to the *New York Times* or to anyone else.

6.

I have been contacted by telephone on one occasion by a reporter who identified himself as being employed by the *New York Times*. I was out of my office at the time I received the call and watching my daughter compete in a high school tennis match. The unsolicited conversation was very brief. During the conversation, I was asked by the reporter if there had been any pre-litigation settlement discussions. I advised him that a mediation had taken place prior to my involvement in the dispute, but I declined to give any information regarding the terms of any settlement offers or disclose any potentially confidential information relating to the mediation proceedings.

7.

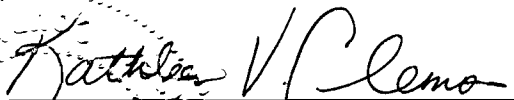
I specifically advised the reporter that I was not counsel for Defendants during the course of the mediation and, at the time of my conversation with the reporter, did not have any particular knowledge regarding specific settlement offers made during the mediation and was only aware that the mediation was unsuccessful. As I was otherwise occupied during the time the conversation took place, I advised the reporter that I did not have any file materials before me. After being asked repeatedly about the amount of any settlement offers and demands, I simply stated that the amount in dispute was significant to my client and the offers made were not to his satisfaction, thus the failure of the dispute to be resolved.

FURTHER AFFIANT SAYETH NOT.



Christopher E. Parker

SWORN TO AND SUBSCRIBED
before me this 1 day
of July, 2008.



Notary Public

My Commission Expires:

